

IN RE:

**PETITION TO INTERVENE
OF VERIZON SOUTH, INC.**

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3. On or about April 3, 2003, the Commission issued Order No. 2003-218, in Docket No. 2003-89-C, wherein the Commission held that a generic proceeding should be established to investigate emergency services continuity plans in general and their various ramifications.

4. On or about April 19, 2005, the Commission issued a Notice of Generic Proceeding, in Docket No. 2005-100-C to investigate the general concept of an emergency services continuity plan.

5. In this proceeding, Verizon intends to make clear that an emergency services continuity plan will afford assurance for continued service to end-users impacted by a competitive local exchange carrier's ("CLEC's") exit from the local market.

6. Verizon has a direct and substantial interest in this docket, given that it provides wholesale services to CLECs and is a designated carrier-of-last-resort. Therefore, Verizon respectfully requests permission to intervene in this matter as a full party of record.

7. Verizon's participation in this docket will help to develop a full and fair record, which, in turn, will assist the Commission competently to resolve the issues in this proceeding.

8. Verizon's request to be made a party of record in this docket is in the public interest, is consistent with the policies of the Commission for public participation in the matters before it, and is necessary for the development of a full and complete record.

Accordingly, Verizon respectfully requests that the Commission, (1) grant this request and issue an order permitting Verizon to participate in this proceeding as a full party of record; (2) allow Verizon to participate fully in the this proceeding and to take such positions as it deems advisable; and (3) grant any other and further relief as is just and proper.

Respectfully submitted this 11th day of May, 2005.

VERIZON SOUTH INC.

BY: _____

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